

IN THE DISTRICT COURT OF LINCOLN COUNTY
STATE OF OKLAHOMA

FILED

JUL 18 2017

CLERK OF DISTRICT COURT
LINCOLN COUNTY, OKLAHOMA

JACKIE AND MARLA WRIGHT,)

Plaintiff,)

vs.)

CASE NO. CJ- 17-93

STATE FARM FIRE &
CASUALTY COMPANY,)

Defendant.)

PETITION

COME NOW the Plaintiffs, JACKIE AND MARLA WRIGHT, and for their claims against the defendant, alleges and states as follows:

1. The plaintiffs, JACKIE AND MARLA WRIGHT are residents of Lincoln County.
2. The defendant, STATE FARM FIRE & CASUALTY COMPANY, (hereinafter "State Farm") is a corporation authorized to provide insurance in the State of Oklahoma. Service can be obtained on Defendant State Farm by serving Oklahoma Insurance Commissioner, 3625 N.W. 56th Street, Suite 100, Oklahoma City, OK.

JURISDICTION AND VENUE

3. Jurisdiction is proper in the State of Oklahoma because Defendant "State Farm" is a corporation licensed to provide insurance in the State of Oklahoma.
4. Venue is proper in The District Court of Lincoln County in that the acts that are the subject of this petition took place in Lincoln County, State of Oklahoma.

FACTS

5. On or about September 3, 2016, plaintiffs' residence was damaged by earthquakes.

6. The Plaintiffs had in full force and effect a policy of insurance which covered plaintiff's residence.

7. The plaintiffs have made claims for property loss to the defendant.

8. Defendant has failed to pay under the terms of the policy and in doing so is in breach of contract.

9. Defendant has failed to honor the terms of its policy and has failed and refused to participate in the appraisal provision of its policy and has tortuously breached its contract⁵ with the plaintiffs.

10. Defendant has wrongfully and unreasonably denied plaintiffs' claim. Defendant has failed to properly investigate plaintiffs' claim and has committed bad faith.

WHEREFORE, the plaintiffs pray for judgment against the defendant for actual damages in excess of the amount required for diversity jurisdiction pursuant to Section 1332 of Title 28 of the United States Code, together with interest, attorney fees, costs of this action, compensatory damages for mental suffering and distress, and such other relief as this Court shall deem just and proper.

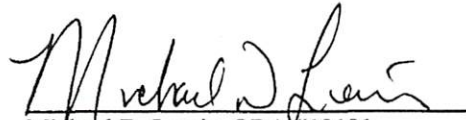
FURTHER, pursuant to 23 O.S. § 9.1 (B) and because the acts and omissions of the defendant represent a total disregard for the rights of the plaintiffs, Plaintiffs pray for and is entitled to judgment against the defendant for exemplary damages.

ATTORNEYS' LIEN CLAIMED

JURY TRIAL DEMANDED

Respectfully submitted,

LAW OFFICES OF MICHAEL D. LEWIS

A handwritten signature in black ink, appearing to read "Michael D. Lewis", written over a horizontal line.

Michael D. Lewis, OBA #12131

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ATTORNEY FOR PLAINTIFFS